

2008 Dec 14 PM 08:50

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO

CLERK U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
AKRON

In re:	)	Case No. 08-53983
	)	
<b>KIMBERLY VALENTI</b>	)	Chapter 13
	)	
	)	Judge Marilyn Shea-Stonum
Debtor	)	
	)	<b><u>MOTION</u></b>
	)	<b><u>OF EXTENSION OF TIME</u></b>
	)	<b><u>FOR FILING DOCUMENTS</u></b>

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Now comes Debtor, by and through counsel and moves the Court for an Order, pursuant to 11 U.S.C. §1107(2)(c) for an additional fifteen (15) day extension of time to file the required schedules and Plan in the above referenced Chapter 13 case.

Debtor's schedules were originally due on November 15, 2008 and the Court has kindly granted two (2) extensions, with the schedules now due on December 14, 2008.

Unfortunately, Debtor Kimberly Valenti is still extremely ill and counsel has still not been able to meet with her to complete the documents necessary.

Wherefore, debtor and counsel pray for a final fifteen (15) day extension of time to file the schedules on or before December 30, 2008.

12/14/2008

Respectfully Submitted,

/s/ Kimberly Valenti  
Francis E. Lucas

/s/ Donald P. Mitchell, Jr.  
Donald P. Mitchell, Jr. (0016178)  
Attorney for Debtor(s)  
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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the Motion was duly sent to the below parties via this Court's ECF (and by ordinary U.S. Mail where indicated) this 14<sup>th</sup> day of December 2008:

U.S. Trustee (via ECF)  
Chapter 13, Trustee, (via ECF)

/s/ Donald P. Mitchell, Jr.  
Donald P. Mitchell, Jr. (0016178)